

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
WESTERN DIVISION**

JANE DOE #1, and JANE DOE #2, on
behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

MG FREESITES, LTD, d/b/a
“PORNHUB”; MG FREESITES II
LTD; MINDGEEK S.A.R.L.;
MINDGEEK USA INCORPORATED;
MG CY HOLDINGS LTD;
MINDGEEK CONTENT RT LIMITED;
9219-1568 QUEBEC, INC., d/b/a
MINDGEEK; MG BILLING LTD,

Defendants.

CIVIL ACTION NO:
7:21-cv-00220-LSC

Honorable L. Scott Coogler

**DECLARATION OF MARK B. SCHOELLER
IN SUPPORT OF PLAINTIFF’S REPLY BRIEF
IN SUPPORT OF THE MOTION FOR CLASS CERTIFICATION**

I, Mark B. Schoeller, hereby declare and state as follows:

1. I am Senior Counsel at the law firm Clark Hill PLC and have been admitted *pro hac vice* as counsel for Plaintiff Jane Doe #1 in the above-captioned action. I am a member in good standing of the State Bars of Pennsylvania and New Jersey and am also admitted to practice in the United States District Courts for the Eastern District of Pennsylvania, the Middle District of Pennsylvania, and the District of New Jersey, and the United States Courts of Appeals for the Third Circuit, Ninth Circuit, and Federal Circuit.

2. I make this Declaration in support of Plaintiff's Reply Brief in Support of the Motion for Class Certification. I have personal knowledge of the matters set forth herein and, if called as a witness, can and will competently testify thereto under oath.

3. Attached hereto as **Exhibit 1** are excerpts from the October 17, 2023 30(b)(6) Deposition of [REDACTED] Collie, which have been filed under seal in accordance with this Court's Order (ECF No. 128).

4. Attached hereto as **Exhibit 2** are excerpts from the October 24, 2023 Deposition of Joseph Fonseca, which have been filed under seal in accordance with this Court's Order (ECF No. 128).

5. Attached hereto as **Exhibit 3** are excerpts from the October 30, 2023 Deposition of Sherrie Caltagirone, which have been filed under seal in accordance with this Court's Order (ECF No. 128).

6. Attached hereto as **Exhibit 4** are excerpts from the September 29, 2023 Deposition of Plaintiff Jane Doe. The Plaintiff has filed a redacted version publicly in accordance with the Protective Order (ECF No. 7) and an unredacted version under seal in accordance with this Court's Order (ECF No. 128).

7. Attached hereto as **Exhibit 5** are excerpts from the August 30, 2023 30(b)(6) Deposition of [REDACTED] Ignatiou, which have been filed under seal in accordance with this Court's Order (ECF No. 128).

8. Attached hereto as **Exhibit 6** is an excerpt from the transcript of the May 24, 2023 CSAM Discovery Hearing in this action.

9. Attached hereto as **Exhibit 7** is a true and correct copy of a November 23, 2018 email bates-labeled MindGeek_NDAL_00001927, which has been filed under seal in accordance with this Court's Order (ECF No. 128).

10. Attached hereto as **Exhibit 8** is a true and correct copy of a March 23-24, 2020 Teams chat conversation bates-labeled MindGeek_NDAL_00059654, which has been filed under seal in accordance with this Court's Order (ECF No. 128).

11. Attached hereto as **Exhibit 9** is a true and correct copy of a September 24-25, 2020 Teams chat conversation bates-labeled MindGeek_NDAL_00100888, which has been filed under seal in accordance with this Court's Order (ECF No. 128).

Pursuant to 18 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: November 6, 2023

/s/ Mark B. Schoeller
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